Remarks

Claims 1 and 14 to more precisely claim the present invention and correct minor typographical errors. No claims have been canceled. Claims 1-40 remain pending in the application.

Examiner Interview Request

In a separate submission today, the undersigned has asked for an Examiner interview to discuss any further clarifications on the teachings of the cited references and how the language of the present claims overcomes the objections raised by the Examiner. Applicant requests that such interview be scheduled once this response has been received by the Examiner.

35 U.S.C. §103

The Examiner rejected claims 1-40 under 35 U.S.C. 103(a) as being unpatentable over Fascenda U.S. 6,466,937 (Fascenda '937) in view of Psounis U.S. Pub. 2002/013851 (Psounis '851). Fascenda '937 generally describes: (i) utilizing a transaction and template database, and (ii) generating a page based on both the template and information from the transaction database. The Examiner has cited passages in Fascenda '937 as describing a delta encoder; however, no such delta encoder is described in the cited passages. Furthermore, Applicant has found no description of a delta encoder anywhere in Fascenda '937. As defined by present independent claims 1, 14, and 29, a delta encoding device calculates delta information for a requested web page based on template information. Fascenda '937 simply does not disclose the use of any delta encoder.

Even if the Applicant accepted the Examiner's assertion that Fascenda '937 does disclose the use of a delta encoder, the Examiner acknowledges that the delta encoder disclosed is not separate from the request server as claimed in the present invention. The Examiner has cited Psounis '851 as disclosing a delta encoder separate from the request server. Applicant acknowledges that Psounis '851 discloses a device that performs delta encoding for classes in a class base file. Present independent claims 1, 14 and 29 claim the use of a request server that forwards requests to a delta encoder

and template server. In contrast, Psounis '851 discloses a condenser 120 that intercepts communications directed to a content server 130. This condenser 120 maintains a class database 122 and creates a delta encoded condensed document. The system disclosed by Psounis '851 is different from the present invention as claimed. In particular, the present invention as claimed contemplates a system where the request server is separate from the delta encoder. Psounis '851 discloses a single device/condenser 120 integrated with a delta encoding function. Such a difference can be important to overall system performance. In the present system as claimed, the request server is separate from the delta encoder and template server. This system arrangement permits load balancing by the request server to a variety of delta encoders and template servers. Additional details of this load balancing function are presently claimed in dependent claims 5 and 6 and further described in paragraph [0032] of the specification.

Applicant respectfully suggests that Fascenda '937 and Psounis '851, when considered individually or together in combination, fail to suggest or teach all of the elements of the presently pending claims. If the teachings of Fascenda '937 and Psounis '851 are combined together as suggested by the Examiner, then a request server would have delta encoding capability included in it. Such a combination falls short of teaching the present invention as claimed. In particular, both Fascenda '937 and Psounis '851 fail to teach the use of a delta encoder separate from a request server as presently claimed in independent claims 1, 14, and 29.

Claims 2-13 depend from claim 1 and therefore are allowable over Fascenda '937 and Psounis '851 for the same reasons that claim 1 is allowable. Claims 15-28 depend from claim 14 and therefore are allowable over Fascenda '937 and Psounis '851 for the same reasons that claim 14 is allowable. Claims 30-40 depend from claim 29 and therefore are allowable over Fascenda '937 and Psounis '851 for the same reasons that claim 29 is allowable.

In addition, dependent claims 4, 21, and 32 are directed to sending statistical information about the benefits of the delta encoder to the template server. The sending

of statistical information is not taught by Fascenda '937. Dependent claims 5, 16, and 33 are directed to having several delta encoders associated with a request server and having the delta encoders logically remote from the template server. Having several delta encoders is not taught by Fascenda '937. Dependent claims 6, 17, and 34 are directed to having several devices or request servers configured to respond to a request and having the devices or request servers logically remote from the template server. Having several devices or request servers is not taught by Fascenda '937. Dependent claims 9-11, 25, 26, 37, and 38 are directed to clientless delta caching systems that have a program fragment sent as part of the delta information. The user of such a program fragment in the delta information is not taught by Fascenda '937. For example, such a program fragment could enable retrieving template information at the client device. The Applicant respectfully points out that the figure and column of text in Fascenda '937 identified by the Examiner does not, and other parts of the same reference do not, teach having delta information with program fragments as presently claimed.

Therefore, under 35 U.S.C. 103(a), Fascenda '937 and Psounis '851 both fail to teach the present invention as claimed in claims 1-40 and a withdrawal of this rejection is respectfully requested.

The Applicant has reviewed the other references cited the by Examiner and determined that they do not teach or suggest the present invention as claimed.

Conclusion

On the basis of the foregoing, Applicant respectfully submits that claims 1-40 are now believed to be in condition for allowance. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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